

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

**Andrew B. Finberg, ESQ.  
Law Office of Andrew B. Finberg, LLC  
525 Route 73 South, Ste. 200  
Marlton, NJ 08053  
(856)988-9055  
Attorney for Triple J's, LLC**

**In Re:**

**Ruth I. Baez**

**Debtor**



Order Filed on July 12, 2022  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**Case No.: 22-13330**

**Adv. No.:**

**Hearing Date:**

**Judge: Jerrold N. Poslusny, Jr.**

**CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13  
PLAN**

The relief set forth on the following pages, numbered two (2) through two (2) is  
hereby **ORDERED**.

**DATED: July 12, 2022**

A handwritten signature in dark ink, appearing to read "Jerrold N. Poslusny, Jr.", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

**Page 2 of 2**

**Debtor(s): Ruth I. Baez**

**Case No: 22-13330**

**Caption of Order: Consent Order Resolving Objection to Confirmation of Debtor's Chapter 13 Plan**

---

**WHEREAS**, on April 25, 2022, the Debtor filed a Chapter 13 Voluntary Petition and Plan;

**WHEREAS**, on June 13, 2022, Triple J's, LLC, through their counsel, The Law Offices of Andrew B. Finberg, LLC, filed an Objection to Confirmation of Debtor's Chapter 13 Plan;

**WHEREAS**, the parties having agreed to enter into a Consent Order Resolving Triple J's, LLC's Objection to Confirmation of Debtor's Chapter 13 Plan;

**IT IS HEREBY ORDERED** that

1. Debtor stipulates to the proof of claim filed by Triple J's, LLC.
2. Debtor to cure all pre-petition arrears within eighteen (18) months of the petition date (April 25, 2022).
3. Debtor is deemed current for all post-petition rent payments due as per the date of the signed consent order (May 2022, June 2022 and July 2022). Debtor to resume regular rent payments as of August 1, 2022. All payments must be paid by the fifth (5<sup>th</sup>) of each month.
4. Thirty (30) day default clause as to both monthly rental obligation and Chapter 13 Trustee payments. Triple J's, LLC is entitled to file a Certification of Default in the event that payments are over thirty (30) days past due.
5. Debtor to immediately pay \$254.16 to Maple Shade Township for water/sewer charges due according to the lease agreement. In the event that utility obligation is not satisfied with fifteen (15) days, Triple J's may file a certification of default with the Court. Thereafter, Debtor to pay all water/sewer bills as they become due with a thirty (30) day default clause as to all future payments.

6. Triple J's, LLC to be adequately protected by receiving Trustee disbursements equivalent to amounts paid for attorney/administrative fees until such time that all attorney fees/costs have been satisfied.

7.

I hereby consent to form and entry of this Order.

Andrew B. Finberg, Esquire  
Attorney for Triple J's, LLC

/s/   
By: Andrew B. Finberg, Esquire

Dated: 7/12/22

Thomas G. Egner, Esquire  
Attorney for the Debtor

/s/   
By: Thomas G. Egner, Esquire

Dated: 7/10/22